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May 15, 2024

VIA ECF

Pamela K. Chen, U.S.D.J.
United States District Court, Eastern District of New York
225 Cadman Plaza East, Courtroom 4F North
Brooklyn, New York 11201-1804

Re: *IME Watchdog, Inc. v. Gelardi, et al.*
Case No.: 1:22-cv-1032 (PKC)(JRC)

Dear Judge Chen:

We represent defendants Safa Gelardi, Vito Gelardi and IME Companions LLC (collectively, “Defendants”) and write to inform the Court, pursuant to its Minute Order dated April 17, 2024, that Defendants reserve the right to call the following witnesses at the hearing scheduled for May 29, 2024: Vito Gelardi (approximately 20 minutes); Safa Gelardi (approximately 20 minutes); Eugene Liddie (approximately 30 minutes); Anthony Infurna (by Declaration Dkt. 328-1); a representative of Subin Associates, LLP (by Declaration or in person for 10 minutes); a representative of Bergman, Bergman, Fields & Lamonsoff (by Declaration or in person for 10 minutes); a representative of Ginarte Gonzalez & Winograd LLP (by Declaration or in person for 10 minutes); and a representative of Zemsky & Salomon P.C. (by Declaration or in person for 10 minutes).

Defendant’s Exhibits are Docket Nos. 274-1; 274-2; and 277. Defendants also request that the Court take judicial notice of Minute Order dated 06/28/2022 disqualifying Ms. Levi and directing plaintiff to withdraw Ms. Levi’s notice of appearance and Minute Order dated 06/29/2022 withdrawing Ms. Levi’s notice of appearance.

Respectfully

/s/ Jonathon D. Warner

JDW/ks
cc: All counsel (via ECF)